

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

KONINKLIJKE PHILIPS N.V. and U.S.)	
PHILIPS CORPORATION,)	
)	
Plaintiffs,)	
)	C.A. No. 15-1131-GMS
v.)	
)	
YIFANG USA, INC. d/b/a E-FUN, INC.,)	
)	
Defendant.)	

STIPULATION AND PROPOSED ORDER

WHEREAS the parties previously agreed to extend the deadline for the defendant to respond to the Complaint to February 8, 2016 (D.I. 9); and

WHEREAS the parties require further time to complete settlement negotiations;

IT IS HEREBY STIPULATED by the parties to this action, subject to the approval of the Court, that defendant's time in which to move, plead or otherwise respond to the Complaint is extended until March 9, 2016.

/s/ Daniel M. Silver

Michael P. Kelly (No. 2295)
Daniel M. Silver (No. 4758)
Benjamin A. Smyth (No. 5528)
MCCARTER & ENGLISH, LLP
Renaissance Centre
405 N. King Street, 8th Floor
Wilmington, DE 19801
(302) 984-6300
mkelly@mccarter.com
dsilver@mccarter.com
bsmyth@mccarter.com
Attorneys for Plaintiffs

OF COUNSEL:

Michael P. Sandonato
John D. Carlin
FITZPATRICK, CELLA, HARPER & SCINTO
1290 Avenue of the Americas
New York, NY 10104
(212) 218-2100

Dated: February 8, 2016

/s/ John W. Shaw

John W. Shaw (No. 3362)
Andrew E. Russell (No. 5382)
SHAW KELLER LLP
300 Delaware Avenue, Suite 1120
Wilmington, DE 19801
(302) 298-0700
jshaw@shawkeller.com
arussell@shawkeller.com
Attorneys for Defendant

OF COUNSEL:

Lucian C. Chen
LUCIAN C. CHEN, ESQ. PLLC
One Grand Central Place
60 East 42nd Street, Suite 4600
New York, NY 10165
(212) 710-3007

SO ORDERED this ____ day of _____, 2016.

United States District Judge